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16 Plaintiffs' Co-Lead Class Counsel

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

19 AARON SENNE, et al., Individually and on  
Behalf of All Those Similarly Situated,

20 Plaintiffs,

21 vs.

22 OFFICE OF THE COMMISSIONER OF  
23 BASEBALL, an unincorporated association  
doing business as MAJOR LEAGUE  
24 BASEBALL, et al.,

25 Defendants.

CASE NO. 3:14-cv-00608-JCS (consolidated with  
3:14-cv-03289-JCS)

**CLASS ACTION**

**DECLARATION OF GARRETT R.  
BROSHUIS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Hearing Date and Time: Feb. 11, 2022, 9:30 PST  
Courtroom: G, 15th Floor  
Judge: Honorable Joseph C. Spero

1 I, Garrett R. Broshuis, hereby declare as follows:

2 1. I am one of the attorneys principally responsible for the handling of this matter.

3 I submit this Declaration in support of Plaintiffs' Motion for Partial Summary Judgment.

4 2. I am personally familiar with the facts set forth in this Declaration. If called as a  
5 witness, I could and would competently testify to the matters stated herein.

6 3. As set forth in the concurrently filed Motion for Partial Summary Judgment, there is  
7 extensive evidence in the record to support granting Plaintiffs' summary judgment in this case. This  
8 evidence, including documents produced in the litigation and depositions taken to date, represents  
9 only a small portion of the evidence supporting Plaintiffs' claims.

10 4. The exhibits cited in support of Plaintiffs' Motion for Partial Summary Judgment are  
11 set forth in the table below. True and correct copies of these exhibits are attached hereto (Exhibits 1  
12 through 115).

13 5. The exhibits corresponding to any deposition transcripts have been limited to the  
14 relevant pages cited in Plaintiffs' brief.

15 6. Pursuant to the parties' Stipulated Protective Order (ECF 233), and further set forth in  
16 Plaintiffs' Administrative Motion to File Certain Documents Under Seal in Connection with Plaintiffs'  
17 Motion for Partial Summary Judgment, any exhibits that have been designated as confidential are  
18 being filed under seal and are denoted as such in the following table.

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EXHIBIT NO.	DESCRIPTION	CONFIDENTIAL DESIGNATION
1	MLB002003	No
2	MLB001663	No
3	Deposition of Colorado Rockies	Yes
4	Deposition of San Francisco Giants (May 19, 2016)	Yes
5	MLB0008914	Yes
6	MLB0031357	Yes
7	Deposition of Seattle Mariners	Yes
8	Deposition of Roy Krasik	Yes
9	MIA0017084	Yes
10	Deposition of John Vuch	Yes
11	Deposition of Texas Rangers	Yes
12	CHC0000088	Yes
13	MLB000039	No
14	Deposition of Fred Seymour	Yes
15	MLB003901	Yes
16	Deposition of Larry Broadway	Yes
17	Deposition of Los Angeles Dodgers	Yes
18	Deposition of MLB, Office of the Commissioner	Yes
19	Deposition of New York Yankees (June 3, 2016)	Yes
20	Deposition of Toronto Blue Jays	Yes
21	Deposition of Oakland Athletics (May 17, 2016)	Yes
22	MLB0007431	Yes
23	Deposition of New York Mets	Yes
24	MLBBENN0000174	No
25	MLB0007449	Yes
26	Deposition of Ian Levin	Yes
27	Deposition of Pittsburgh Pirates	Yes
28	Deposition of Chicago Cubs	Yes
29	MLB003340	No
30	MLBKAHA0000005	No
31	MLBODLE0000493	No
32	MLBODLE0000020	No
33	BOS0000001	Yes
34	MIL0003559	Yes
35	Deposition of Bobby Scales	Yes
36	Deposition of Dave Owen	Yes
37	Deposition of Bill Bavasi	Yes
38	Deposition of Brian Harper	Yes
39	Deposition of Scott Sharp	Yes
40	Deposition of Quinton McCracken	Yes

EXHIBIT NO.	DESCRIPTION	CONFIDENTIAL DESIGNATION
41	Deposition of Doug Davis	Yes
42	Deposition of Jim Rantz	Yes
43	MIN0009362	Yes
44	MIN0002319	Yes
45	KAN000277	Yes
46	PHI0000535	Yes
47	WAS0000141	Yes
48	TOR0002728	Yes
49	MLB0007488	Yes
50	ARI0035184	Yes
51	MLB0007485	Yes
52	MLB003208	No
53	MIA000649	Yes
54	MLB002671	No
55	MLB002655	No
56	MLB0006628	Yes
57	CIN0010748	Yes
58	MLBSENN0000323	No
59	ARI0011305	Yes
60	TOR0010583	Yes
61	MIN0003625	Yes
62	MLB002634	Yes
63	MLB Press Release (Feb. 12, 2021)	No
64	Deposition of Cody Sedlock	No
65	NY0000105	Yes
66	MLBODLE0000004	Yes
67	MLBSMIT0000448	No
68	Deposition of Kansas City Royals	Yes
69	MLB0031373	Yes
70	MLB0031368	Yes
71	Deposition of Barret Loux (Apr. 26, 2016)	Yes
72	MLB003352	No
73	Deposition of Matthew Lawson	No
74	MLB0007486	Yes
75	MLB003310	No
76	CWS0000194	Yes
77	Deposition of Brian Chattin	Yes
78	Deposition of Los Angeles Angels	Yes
79	Deposition of Bryan Henry	No
80	MLBHENRB0000117	No

EXHIBIT NO.	DESCRIPTION	CONFIDENTIAL DESIGNATION
81	MLB0030710	Yes
82	MLB0007429	Yes
83	MLB0030694	Yes
84	MLB0030741	Yes
85	MLB0027457	Yes
86	MLBMEAD0000182	No
87	MLBMEAD0000183	No
88	MLBSMIT0000334	No
89	MLBSMIT0000335	No
90	MLB001973	No
91	Deposition of Baltimore Orioles	Yes
92	Deposition of Michael Liberto	No
93	Deposition of Tim Pahuta	No
94	Supplemental Expert Report of Brian Kriegler, Ph.D.	Yes
95	Deposition of Jody Reed	Yes
96	Deposition of Milwaukee Brewers	Yes
97	Deposition of Miami Marlins	Yes
98	Deposition of Aaron Dott	No
99	SFG0028633	Yes
100	Deposition of Oakland Athletics (May 19, 2016)	Yes
101	Expert Rebuttal Report of Erica Groshen, Ph.D.	No
102	Deposition of Keith Lieppman	Yes
103	Deposition of Peter Woodfork	Yes
104	PIT0000098	Yes
105	Deposition of Christopher Gwynn	Yes
106	Deposition of Tony Diggs	Yes
107	Letter from E. Bloom to G. Broshuis (Nov. 9, 2020)	No
108	Deposition of Frank Viola	Yes
109	Deposition of Gabe Kapler	Yes
110	Deposition of Ricky Bennett	Yes
111	Deposition of Arizona Diamondbacks	Yes
112	Deposition of Casey Candaele	Yes
113	Deposition of San Diego Padres	Yes
114	Deposition of Denise Martin, Ph.D. (Sept. 9, 2021)	No
115	Rebuttal Report of Jonathan Guryan, Ph.D.	Yes (select parts)

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

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4 Executed on October 29, 2021, in St. Louis, Missouri

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6 /s/ Garrett R. Broshuis  
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